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June 23, 2022

VIA CM/ECF

United States Court of Appeals for the Fourth Circuit
Patricia S. Connor, Clerk
Lewis F. Powell Jr. Courthouse & Annex
1100 East Main Street, Suite 501
Richmond, Virginia 23219

Re: *Maryland Shall Issue, et al. v. Lawrence Hogan, et al.*, No. 21-2017 (L)

Dear Ms. Connor:

Pursuant to this Court's November 2, 2021 Order (Doc. 14) as well as Federal Rule of Appellate Procedure 28(j) and Local Rule 31(a), Appellants notify this Court that the Supreme Court has issued its opinion in *New York State Rifle & Pistol Association, Inc. v. Bruen*, No. 20-843 (June 23, 2022) and respectfully request that this Court issue a formal briefing schedule.

In *Bruen*, the Supreme Court reiterated the standard that lower courts must use to determine the constitutionality of laws burdening activity protected by the Second Amendment:

When the Second Amendment's plain text covers an individual's conduct, the Constitution presumptively protects that conduct. The government must then justify its regulation by demonstrating that it is consistent with the Nation's historical tradition of firearm regulation. Only then may a court conclude that the individual's conduct falls outside the Second Amendment's unqualified command.

Slip Op., at 15 (quotation omitted). The Court expressly rejected "means-end scrutiny" as part of this standard. *Id.* at 13–15. A copy of *Bruen* is attached to this letter.

Now that the Supreme Court has decided *Bruen*—removing any potential ambiguity with regard to the standard under which Appellants' Second Amendment challenge to Maryland's Handgun Qualification License will be reviewed—Appellants respectfully request that this Court issue a formal briefing schedule.

Respectfully submitted,

/s/ John Parker Sweeney

John Parker Sweeney

Counsel for Appellant Atlantic Guns, Inc.

cc: All Counsel (Certificate of Service attached)

Enclosure: *New York State Rifle & Pistol Assn., Inc. v. Bruen*, No. 20-843, (June 23, 2022).

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2022, I filed the foregoing with the Clerk of the Court via CM/ECF, which will provide electronic service to all counsel of record.

Respectfully submitted,

/s/ John Parker Sweeney

John Parker Sweeney

Counsel for Appellant Atlantic Guns, Inc.